

EXHIBIT D

**CONFIDENTIAL VIDEOTAPED DEPOSITION OF JILL GILES-KOMAR
CONDUCTED ON FRIDAY, DECEMBER 2, 2010**

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MASSACHUSETTS

3 ABBOTT GMBH & CO., KG,

4 ABBOTT BIORESEARCH CENTER, INC.

5 AND ABBOTT BIOTECHNOLOGY, LTD.,

6 Plaintiffs, CIVIL ACTION

7 Vs.

NO. 4:09-cv-11340-FDS

8 CENTOCOR ORTHO BIOTECH, INC.,

9 AND CENTOCOR BIOLOGICS, LLC.,

10 Defendants.

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CONFIDENTIAL TRANSCRIPT

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14 Videotaped deposition of JILL GILES-KOMAR,
15 taken at Centocor Ortho Biotech, Inc., 145 King of
16 Prussia Road, Radnor, Pennsylvania, on Friday,
17 December 2, 2010, beginning at approximately 9:30
18 a.m., before Maureen E. Broderick, Registered
19 Professional Reporter and Notary Public in and of
20 the Commonwealth of Pennsylvania.

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1 Q So was Remicade a chimeric antibody?

2 A Yes.

3 Q What do you understand that to mean?

4 A That it is part mouse and part human.

5 Q Have you ever been involved in discovery
6 of a chimeric antibody using that definition?

7 MR. PEARSON: Objection to form.

8 THE WITNESS: No.

9 BY MR. GUNTHER:

10 Q Have you ever been involved in any
11 discovery work relating to a humanized antibody?

12 A No.

13 Q Now, you've heard that term before,
14 "humanized," right?

15 A Right.

16 Q What do you understand that to mean?

17 A My understanding is that humanized
18 antibodies are antibodies that are -- begin as maybe
19 another species and then is converted into being
20 human by some process.

21 Q Do you distinguish humanized antibodies
22 from fully human antibodies?

23 A I do, yes.

24 Q And what is the distinction in your mind
25 between those two?

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1 A A fully human antibody is an antibody
2 that's human of origin.

3 Q It starts out from the get-go as a human
4 antibody?

5 A It comes from human DNA, human -- that's
6 my understanding.

7 Q And you've obviously been involved in the
8 discovery of antibodies that are fully human,
9 correct?

10 MR. PEARSON: Objection.

11 THE WITNESS: Yes.

12 BY MR. GUNTHER:

13 Q When did that work -- when did that work
14 start for you? Is that work that you believe you
15 would have started in sort of the mid 1990s?

16 A I'd have to look at my declaration, but I
17 believe it was around 1997.

18 Q And I'm going to -- I'm not trying to make
19 this a memory test. I will show you your
20 declaration. I promise you that.

21 A Okay.

22 Q Let me just ask you this, first: Was your
23 initial work in 1997 that's described in the
24 declarations -- I think there's two of them actually
25 that were submitted in the interference -- was that